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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY, et al.,

Defendant

No. CR 05-60008 HO

**DEFENDANT'S MOTION TO
UNSEAL SEALED UNCLASSIFIED
VERSIONS OF TRANSCRIPTS
AND DOCUMENTS**

Defendant Pirouz Sedaghaty, through counsel, Lawrence Matasar and Federal Public Defender Steven T. Wax, hereby moves this Court to unseal sealed, unclassified transcripts and/or documents.

Listed below are the documents counsel is requesting be unsealed:

- CR 199 July 13, 2009 hearing, page 48
- CR 490, Defense declarations concerning government closing
CR 492 argument
- CR 508 Declaration of Colleen Anderson concerning government
closing argument
- CR 481 Pursuant to the Court's order of September 29, 2010, (CR
481) the Court Security Officer has provided a redacted set
of transcripts of several of the Court's in camera proceedings
during trial. The defense requests these transcripts be filed
on the public record. See Exhibit A, email from CSO Scooter
Slade dated November 22, 2010.

Counsel is unaware of any confidential information of a sensitive nature
in the documents and/or pages requested to be unsealed.

- CR 454 Day one of trial, September 11, 2010.
- CR 465 Unredacted jury verdict.
- CR 473 Unredacted day eight of trial, September 9, 2011 (CR 472
orders a redacted version of the transcript be filed on the
docket

CR 454 (Voir Dire), CR 465 (Unredacted Jury Verdict) and CR 473
(Unredacted day eight of trial) were all sealed on the Court's own motion. If
the only portions of these documents that are of concern to the Court are the
juror names, the need for unsealing is less, particularly if the only redactions
made with respect to the jury verdict and the day eight of the jury trial, are the
names of the jurors. However, with respect to the Voir Dire, in order to

facilitate the appellate process, the defense requests that a version be filed publicly that substitutes juror initials for juror names.

Unsealing these documents will alleviate laborious efforts on the part of both parties and the appellate court with any possible appeal in which these sealed documents may be referenced.

Respectfully submitted this 27th day of September, 2011.

/s/ Steven T. Wax

Steven T. Wax

Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar